

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE:** : **19-15668 ELF**  
**JOSEPH PRINCE** :  
 :  
 : **Chapter No. 13**  
**Debtor** :  
 :

**NOTICE OF APPEARANCE AND DEMAND FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that the undersigned appears for **WELLS FARGO BANK, N.A.** (“the Creditor”), and pursuant to Bankruptcy Rule 2002(g) and 2002(h) and 9007 and §1109(b) of the Bankruptcy Code, with regards to the real property, located at 778 MILL ROAD, YARDLEY, PA 19067-4500 with the mortgage recorded on April 12, 1994 Book 883, Page 1258, Instrument Number 1994036776 demands that all notices that are required to be given in this case and all papers that are required to be served in this case, be given to and served upon the undersigned at the office, post office address and telephone number set forth below.

**PLEASE TAKE FURTHER NOTICE** that pursuant to §1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral whether transmitted or conveyed by mail, delivered, telephone, telegraph, telex or otherwise which affect or seek to affect in any way the Creditor’s rights or interest, with respect to Debtor or the property on which Creditor holds a first mortgage lien.

March 2, 2020

/s/ Jerome Blank, Esquire  
Jerome Blank, Esq., Id. No.49736  
Phelan Hallinan Diamond & Jones, LLP  
1617 JFK Boulevard, Suite 1400  
One Penn Center Plaza  
Philadelphia, PA 19103  
Phone Number: 215-563-7000 Ext 31625  
Fax Number: 215-568-7616  
Email: jerome.blank@phelanhallinan.com